As a small market broadcaster who is also an owner/operator, I feel compelled to address the Commissions concern about broadcast localism. As you read, keep in mind that of my both stations are primarily music stations. Out of a fulltime staff of seven, three employees spend the majority of their time, gathering, writing and producing local news, local sports and attending and covering local meeting. Two additional employees are also involved in posting the news to our website and directing the news department.

Yesterday (11/13) we were simultaneously broadcasting a local football game on each station. We produced and broadcast two $(1\frac{1}{2}$ to 2 hour) candidate forums, one before the primary and another prior to the general election. We also produced and broadcast a five part series to educate local citizens about the amendments on the ballot. We broadcast thirty newscasts a week on KRAI-FM and twenty-five newscasts a week on KRAI-AM. And we also broadcast local basketball games and wrestling in addition to football.

We hold an annual food; toy and clothing drive each December, which benefits the local food bank, a toys-for-kids program, a gifts-for-senior citizens program, and the local anti-domestic violence agency. During last years weeklong drive alone; we collect hundreds of new toys, tons of food and over \$20,000 in cash to help the agencies and programs.

This is just a sample of how me continuously serve our local community.

All of the above is contingent upon my business being financially secure.

I am very concerned that actions of the Commission would compel me to record, certify my actions, file additional paperwork, and require me to use my limited financial and personnel resources, and time that I currently use to assure my desired to be very local. I believe such action would have an effect contrary to what the Commission desires. I do not have the financial resources to have an attorney or a chief engineer. I currently function in both of those capacities and only hire professionals when absolutely necessary.

I understand that there are likely other broadcaster that are not as concerned about localism. But please do not take any action that will require operators like myself to have to choose between serving our community and being local or spending our time and money on paperwork, filing, needless equipment and engineering.

Sincerely,

Frank R. Hanel, Jr.
President/General Manager
KRAI-AM & KRAI-FM
Craig, Colorado